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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

PAMELA RUBIN-KNUDSEN, an individual; and MARNINE CASILLAS, and individual on behalf of themselves, and all other persons similarly situated.

**Plaintiffs,**

VS.

ARTHUR J. GALLAGHER & CO., a  
Delaware corporation, ARTHUR J.  
GALLAGHER SERVICE  
COMPANY, LLC, a limited liability  
company,

## Defendants.

Case No.: 2:18-cv-06227-JGB-SPx

# **NOTICE OF MOTION AND MOTION FOR ATTORNEYS' FEES, COSTS AND INCENTIVE AWARDS**

[*Memorandum and Declarations of Jason M. Frank, Pamela Rubin-Knudsen, and Marnine Casillas, filed concurrently herewith*]

Date: March 15, 2021  
Time: 9:00 a.m.  
Courtroom: 1  
Judge: Hon. Jesus G. Bernal

1                   **TO THE COURT AND ALL PARTIES OF RECORD:**

2                   **PLEASE TAKE NOTICE** that on March 15, 2021 at 9:00 a.m. in Courtroom 1  
3 of the United States District Court for the Central District of California, located at 3470  
4 Twelfth Street, Riverside, California 92501, Plaintiffs Pamela Rubin-Knudsen and  
5 Marnine Casillas (“Plaintiffs”) will and hereby do move for an order:

6                   1. Awarding Class Counsel \$2,666,667.00 in attorneys’ fees and \$123,046.62  
7                   in litigation costs;

8                   2. Awarding Plaintiff Pamela Rubin-Knudsen an incentive award of  
9                   \$15,000.00; and

10                  3. Awarding Plaintiff Marnine Casillas an incentive aware of \$10,000.00.

11                  This Motion is based on this Notice of Motion and Motion, the supporting  
12 Memorandum of Points and Authorities, the Declarations of Jason M. Frank, Pamela  
13 Rubin-Knudsen and Marnine Casillas, and such other and further material to be offered  
14 in response to any objections or at the hearing.

16 Dated: January 17, 2021

FRANK SIMS & STOLPER LLP

17                  By: /s/ Jason M. Frank  
18                   Jason M. Frank  
19                   Scott Sims  
20                   Attorneys for Plaintiffs